

In the Supreme Court of the United States

Urvashi Bhagat, *Petitioner*, v. Andrei Iancu, *Respondent*.

Motion to File Amicus Brief Out of Time

Counsel for Amici states the following:

Respondent Iancu, through the U. S. Department of Justice, provided notice to Counsel at 3:39PM on **October 3, 2018**, that Respondent would not oppose entry of the Amicus Brief at issue. Because of the timing, Counsel was forced to revise and re-print the Amicus Brief to reflect Respondent's permission. Despite Counsel's best efforts, Counsel was unable to physically deliver, or cause to be delivered, the required paper copies by midnight of October 4, 2018.

The required paper copies were delivered about 3:00PM on October 5, 2016, which is less than 48 hours after Respondent gave notice of their permission.

Further, Counsel states that it was his understanding under the Supreme Court's Rules that the paper copies could be timely filed three calendar days after electronic filing. Counsel apologizes for this misunderstanding.

Counsel further asserts that no prejudice was caused by the one-day delay in delivering the required paper copies.

WHEREFORE Counsel respectfully requests that this Court grant Amici permission to file their brief out of time.

Burman York Mathis, Esq.
Counsel for Amici Curiae